

From: [Fortenberry, Chase](#)
To: [Saric, James](#); [Wood, Nicole](#)
Cc: [BUCHOLTZP@michigan.gov](#); [wagonerr1@michigan.gov](#); [Davis, Michael \(GP Law\)](#); [Lathrop, Alison J. \(GP LAW\)](#); [Massengill, Dave G.](#); [Garret Bondy](#); [Michael J. Erickson \(michael.erickson@arcadis-us.com\)](#); [Griffith, Garry T.](#)
Subject: Area 1 FS Extension Request
Date: Wednesday, March 20, 2013 11:29:27 AM
Attachments: [Kalamazoo River Area 1 FS extension request March 18 2013.pdf](#)

Jim,

Attached is Georgia-Pacific's formal request for an extension of the due date to submit the revised FS report. Garry is on vacation until the March 26th but I will be available to answer any question you may have regarding this submittal in the interim.

Regards,

L. Chase Fortenberry, P.G.

Manager - Environmental Engineering

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March 19, 2013

Mr. James Saric
Remedial Project Manager
USEPA Region 5
Office of Regional Counsel
77 West Jackson Boulevard (C-14J)
Chicago, Illinois 60604-3507

Subject: Area 1 Draft Feasibility Study Report

Dear Jim,

Georgia-Pacific LLC has carefully reviewed both the USEPA letter dated February 5, 2013 which disapproved and commented on the Area 1 draft FS report as well as the comments of the state of Michigan dated February 15, 2013. Due to the number and significance of the comments as well as the fact that Georgia-Pacific is in the process of retaining a new primary environmental consultant for the project, pursuant to Paragraphs 27, 31, 39, 40, 41 and 103 of AOC V-W-07-C-864, Georgia-Pacific requests a 130 day extension of the current March 22, 2013 date for submittal of the revised FS report. Georgia-Pacific supports its requested time extension in the following paragraphs.

Over the last four weeks Georgia-Pacific has conducted a search for a new primary environmental consultant to complete the SRI/FS requirements in the AOC. A RFP was submitted to four firms on February 5, 2013, interviews were conducted during the week of March 4th, and Amec was selected on March 18th. Amec will immediately begin transitioning into the project and will take the lead in responding to the comments.

As discussed during our February 20, 2013 meeting, Georgia-Pacific is agreeable to working with the agencies to resolve the USEPA comments provided on a number of basic methods and procedures (e.g., methods to calculate the sediment PCB surface weighted average concentration (SWAC), and methods to trend historic fish PCB tissue concentration data and predict future concentrations), issues which Georgia-Pacific thought were agreed to in the approved SRI report. Selection of appropriate methods is critical to both the evaluation of the effectiveness of the array of remedial alternatives in the Area 1 FS, but also for monitoring and evaluating post-remedy progress toward achievement of selected remedial goals. Georgia-Pacific expects that it should take 30 to 60 days for the work groups to go back over these key issues and reach agreement.

Since many of the requested revisions to the FS report are dependent upon having acceptable sediment SWAC and fish trending methods in place, most of the effort to complete the analysis of the existing and any new alternatives cannot be started until the comments associated with these methods are resolved.

Georgia-Pacific is also concerned about the requested changes to the RAOs that we thought were agreed to during the ASTM process, as well as agreements we thought were reached on the TBERA included in the approved SRI report. To attempt to resolve these concerns, Georgia-Pacific requested and EPA agreed to toll the time period to formally dispute these comments 60 days to April 22nd. Georgia-Pacific has proposed a meeting with EPA and DEQ management in early April in an effort to resolve these issues outside of the formal dispute resolution process. Georgia-Pacific will follow-up within the next week to confirm the meeting date. We would also like to discuss the larger project schedule, as we have concerns about the value of data collection so far in advance of decision making and upstream project work.

We appreciate your consideration of this request and look forward to working with USEPA and MDEQ in completing the Feasibility Study.

Sincerely,

Georgia-Pacific, LLC

A handwritten signature in black ink, appearing to read "Garry Griffith". The signature is fluid and cursive, with the first name "Garry" being more prominent than the last name "Griffith".

Garry Griffith, P.E.

Nicole Wood, Esq., USEPA
Paul Bucholtz, MDEQ
Robert Wagner, MDEQ
J. Michael Davis, Esq., Georgia-Pacific LLC
Alison Lathrup, Esq., Georgia-Pacific LLC
Chase Fortenberry, Georgia-Pacific LLC
Garret Bondy, P.E., Amec
Michael Erickson, P.E., ARCADIS